

UNITED STATES DISTRICT COURT  
for the  
**District of Massachusetts**

JOSE MARIA DECASTRO, an individual	)	Case No. 1:22-cv-11421
	)	
Plaintiff,	)	<b>SECOND SUPPLEMENTAL</b>
	)	<b>COMPLAINT</b>
v.	)	
	)	<b>(Leave to file granted on 1/12/2023)</b>
JOSHUA ABRAMS, an individual,	)	
KATE PETER, an individual,	)	
JOHN DOES 1-50,	)	
YOUTUBE (GOOGLE LLC), a corporation,	)	
JOHN DOES 1-20, individuals,	)	
	)	
Defendants.	)	
	)	

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**SUPPLEMENTAL COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(d), plaintiff Jose DeCastro (“Plaintiff”) hereby files this second supplemental complaint to its First Amended Complaint (ECF No. 62) (“FAC”), and Supplemental Complaint (ECF No. 79), in connection with its federal claim of copyright infringement. This supplement adds new claims, for events that have occurred since the filing of the FAC. Further, Plaintiff supplements facts and copyrighted works (“Works”) and alleges as follows:

**INTRODUCTION**

1. Since the filing of the FAC and Supplemental Complaint, all Defendants including unknown ones, have committed additional copyright and DMCA violations against Plaintiff.

## **FACTUAL BACKGROUND**

2. URLs of Plaintiff's new copyrighted content since the first supplemental complaint are in **Exhibit 1**.

## **SUPPLEMENTAL TO COUNT 1**

### **(COPYRIGHT INFRINGEMENT)**

3. Infringements of my copyrighted works have been published, including, but not limited to, at the following URLs. Against All Defendants.

<https://www.youtube.com/watch?v=-hKc-cHQPYy>  
<https://www.youtube.com/watch?v=y5LCwhwjwJ0&t>  
<https://www.youtube.com/watch?v=ajPcj3GtF8>  
<https://www.youtube.com/watch?v=iQD3VemilPY>  
<https://www.youtube.com/watch?v=JvpZ7G2cGj4>  
<https://www.youtube.com/watch?v=TNgRK42aAfE>  
[https://www.youtube.com/watch?v=m\\_IOV5TShHM](https://www.youtube.com/watch?v=m_IOV5TShHM)  
<https://www.youtube.com/watch?v=6gCqfKmixOs>  
[https://www.youtube.com/watch?v=KpEZhUQf\\_Cw](https://www.youtube.com/watch?v=KpEZhUQf_Cw)  
<https://www.youtube.com/watch?v=09odoxysZes>  
[https://www.youtube.com/watch?v=\\_HMwbWHicIo](https://www.youtube.com/watch?v=_HMwbWHicIo)  
<https://www.youtube.com/watch?v=mMoQfRrwwss>  
<https://www.youtube.com/watch?v=FtvOs64did4>  
<https://www.youtube.com/watch?v=aGTy6dffVEg>  
<https://www.youtube.com/watch?v=jgBhLZXwpbo>  
<https://www.youtube.com/watch?v=4X1lqBWVYPC>  
<https://www.youtube.com/watch?v=S543WJt7fLY>  
<https://www.youtube.com/watch?v=WRXLHRtkya8>  
<https://www.youtube.com/watch?v=0wRv05Vxoeg>  
[https://www.youtube.com/watch?v=C\\_ocJfvX3lQ](https://www.youtube.com/watch?v=C_ocJfvX3lQ)  
<https://www.youtube.com/watch?v=PYSVEQ1JW4c>  
<https://www.youtube.com/watch?v=9f8UaSIQXIg>  
<https://www.youtube.com/watch?v=KGdlNIZooZY>  
<https://www.youtube.com/watch?v=S-NdYKLdYj8>  
<https://www.youtube.com/watch?v=Qyg9PsI6vY0>  
<https://www.youtube.com/watch?v=GFYz1VloS9U>  
<https://www.youtube.com/watch?v=2-7eQ90QwR8>  
<https://www.youtube.com/watch?v=8IfwmYfyiCo>  
<https://www.youtube.com/watch?v=sGnHT3xyt08>  
<https://www.youtube.com/watch?v=aCV2aVDgYXQ>

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: April 24, 2023

Respectfully submitted,

/s/ Jose DeCastro  
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*Pro Se*